

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

KARUNAMUNIGE CHAMILA  
KRISHANTHI, *et al.*,

Plaintiffs,

v.

RAJAKUMARA RAJARATNAM, *et al.*,

Defendants.

Civil Action No. 2:09-cv-05395-BRM-JSA

**JOINT SCHEDULING  
ORDER**

THIS MATTER coming before the Court-appointed Special Master related to the imminent completion of Phase I fact and expert discovery, through their undersigned counsel of record; and

WHEREAS, the parties have agreed to the schedule for each of the four remaining depositions related to Phase I fact and expert discovery, to wit, the continued deposition of the Confidential Witness on January 23, 2024; the deposition of Defendants' responsive expert witness Dr. Chris Smith on January 11, 2024; the deposition of Defendants' responsive expert witness Dr. Peter Chalk on January 18, 2024; the deposition of Plaintiff's expert witness Dr. Rohan Gunaratna on January 31, 2024; and

WHEREAS, the parties have agreed to the briefing schedule proposed below; and

WHEREAS, the parties seek the Court to endorse this schedule to provide a timeline for the filing of dispositive-motion briefing to permit the close of Phase I of this litigation.

**It is hereby ORDERED** this 2nd day of January, 2024, that:

1. Dispositive motions regarding Phase I liability shall be filed based upon the following briefing scheduling:

- a. dispositive motions shall be brought within **forty-five (45) days** of the completion of the four Phase I fact- and expert-discovery depositions;
- b. opposition to any dispositive motion shall be filed within **forty-five (45) days** of service of the motion; and
- c. any reply shall be filed within **twenty (20) days** of the opposition.

**SO ORDERED.**

/s/ Joseph A. Dickson  
**Special Master Joseph A. Dickson**